

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

Jon Q. Wright and JQ Licensing LLC;

Plaintiffs

V.

Robert Snider d/b/a Trappers Point Camp,
Stratford Sign Company, and Does 1-5

Defendants.

[illegible]

Case No.: 3:22-cv-00347-JDP

PLAINTIFFS' INITIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)(1)

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Jon Q. Wright and JQ Licensing LLC (“Plaintiffs”) hereby submit their initial disclosures. These initial disclosures are based on the information reasonably available to Plaintiffs at this time and are made without waiving any objections as to relevance, materiality, or admissibility of evidence in the action. Plaintiffs are in the process of continuing its investigation and analysis of the facts and issues relating to this action. Consequently, Plaintiffs reserve the right to revise, correct, supplement, or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

1. Individuals Likely To Have Discoverable Information: The following individuals are likely to have discoverable information that Plaintiffs may use to support their claims in this action:

Name	Organization and Title	Contact Information	Subject Matter
Jon Q. Wright	JQ Licensing LLC, Principal	Contact through counsel	General Knowledge regarding the claims asserted, including the creation of the Subject Work, Plaintiffs damages, etc.
Robert Snider	Trappers Point Camp, Co-owner	1 Trappers Point Rd, Savant Lake, ON P0V 2S0, Canada	Issues relating to the exploitation of a logo containing the Subject Work and Defendant's gross revenues, profits
Dan Drexler/Cara Drexler	Stratford Sign Company, LLC	212805 Connor Ave, Stratford, WI 54484	Issues relating to the creation of the logo containing the Subject Work, the creation of a new non-infringing logo, as well as Defendant's gross revenues, profits as it relates to the creation of the logo containing the Subject Work
Beau McGraw, Esq.	McGraw Law Firm, P.A.,	10390 39th St N STE 3, Lake Elmo, MN 55042	Issues relating to communications with Plaintiffs' counsel prior to, and immediately after the initiation of this action

In addition, Plaintiffs anticipate that other, unknown individuals may have discoverable information that Plaintiffs may use to support their claims or defenses. Plaintiffs incorporate by reference any other individuals disclosed by other parties in this matter and reserve the right to supplement this disclosure pursuant to Fed. R. Civ. P. 26(e).

Plaintiffs reserve the right to obtain discovery in support of their claims from any witness identified in any other party's Rule 26(a)(1) disclosure.

2. Documents Relevant to Plaintiffs Claims: Plaintiffs submit the following descriptions of documents, electronically stored information, or tangible things in their possession, custody, or control that they may use to support their claims:

- a. Documents associated with the copyright application and registration related to the Subject Work.
- b. Documents concerning the Subject Work's authorship, creation, publication, etc.
- c. Documents reflecting the scope and nature of the infringing acts by Defendants, including, but not limited to documentary evidence published by Defendants onto social media, third-party websites, etc.
- d. Correspondence between the parties regarding the Subject Work.
- e. Materials comparing/analyzing the Subject Work and the Infringing Logo.
- f. Documents reflecting the harm to Plaintiffs caused by the infringing acts, including but not limited to, prior license agreements for comparable works of art.

3. Computation of Damages: Plaintiffs have suffered damages in amounts presently unknown. Within the time limits prescribed by the Copyright Act, Plaintiffs shall make their election between actual damages or statutory damages.

Should Plaintiffs elect actual damages, Plaintiffs will seek damages suffered as a result of the infringement in an amount that adequately compensates Plaintiffs for the reduction of the fair market value of the work caused by the infringement, including lost licensing revenue. Further, Plaintiffs shall seek Defendants' profits, attributable to the infringement, to the extent not already calculated through the reduction of fair market value, lost licensing revenue, etc.

Should Plaintiffs elect statutory damages, Plaintiffs will seek an award that not only compensates Plaintiffs for their losses, but also to penalize Defendants and deter future violations of copyright laws.

Plaintiffs shall also seek to recover their full costs and reasonable attorneys' fees.

4. Insurance Agreements: Plaintiffs have no relevant insurance policies.

Dated: October 17, 2022

Respectfully Submitted,

/s/ Dmitry Lapin

Dmitry Lapin, Esq.

Axenfeld Law Group LLC

2001 Market Street Suite 2500

Philadelphia PA 19103

dmitry@axenfeldlaw.com

917-979-4570

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

On October 17, 2022, I served via ECF, true copies of the following document described as Plaintiffs' **PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)** on counsel for the parties in this action, as follows:

Matthew J. Cavanagh, Esq.
MCDONALD HOPKINS LLC
600 Superior Ave., East, Ste. 2100
Cleveland, OH 44114
mcavanagh@mcdonaldhopkins.com
Counsel for Stratford Sign Company

Andrew M. Scarpace, Esq.
John P. Loring, Esq.
Wilson Elser Moskowitz Edelman & Dicker LLP
555 E. Wells Street, Suite 1730
Milwaukee, WI 53202
Andrew.Scarpace@wilsonelser.com
John.Loring@wilsonelser.com
Counsel for Defendant Robert Snider d/b/a Trappers Point Camp

Executed this 17th day of October 2022

/s/ Dmitry Lapin
Dmitry Lapin, Esq.